



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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REGION VIII

999 18th STREET - SUITE 500
DENVER, COLORADO 80202-2466

ADMIN RECORD

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OPTIONAL FORM 99 (7-90)

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Ref: 8HWM-KK

Mr. Steve Slaten
U.S. Department of Energy
Rocky Flats Field Office
P.O. Box 928
Golden, CO 80402-0928

Dear Mr. Slaten:

To: <u>DOE</u>	From: <u>HESTMAR</u>
Dept./Agency: <u>DOE</u>	Phone #: <u>294-1134</u>
Fax #: <u>294-2848</u>	Fax #: <u>294-7559</u>
NSN 7540-01-317-7368 5099-101 GENERAL SERVICES ADMINISTRATION	
To: <u>STEVE SLATEN</u>	From: <u>MARTIN HESTMAR</u>
Dept./Agency: <u>DOE</u>	Phone #: <u>294-1134</u>
Fax #: <u>966-4871</u>	Fax #: <u>294-7559</u>
NSN 7540-01-317-7368 5099-101 GENERAL SERVICES ADMINISTRATION	

This letter is forwarded in response to the DOE letter sent June 1, 1995, requesting EPA concurrence on the evaluation and removal of polychlorinated biphenyls (PCB) contaminated soil and concrete of the substation and to forward our conditional approval of the PCB Proposed Action Memorandum (PAM), dated May, 1995.

With respect to the letter regarding the cleanup of the substation soils, EPA will allow the use of Draft Method 4020 for cleanup verification provided the DOE submits a report to EPA providing the results of the analyses conducted in fulfillment of the following two conditions:

(1) A comparison study, using an appropriate gas chromatography (GC) analytical procedure such as EPA Method 8080 or 8280 to analyze the PCB remediation wastes, shows that there are no materials present in the PCB remediation waste which would interfere with the screening test. (For purposes of this condition, interfering with the PCB field screening test means that for the analysis of at least three samples having PCB levels greater than 10 ppm, the PCB concentration reported by the PCB field screening test is no less than 75% of the PCB concentration reported utilizing the GC method for the same sample.)

(2) 20% of the verification samples to be analyzed using EPA Method 8080 and using gas chromatography with an electron capture detector (GC/EC) will be split and also analyzed using EPA Draft Method 4020 to confirm that there is substantial agreement between the methods. Sample splits will be taken and both types of analyses will be performed for both the substation soils and the concrete transformer pads. Should 25% or more of the GC/EC analyses of the split samples reveal higher levels of PCBs for method 8080 than for the Draft Method 4020, then the Draft Method 4020 may not be used for cleanup verification.

DOE must evaluate the results of the Method 8080 and Method 4020 analyses and present this evaluation to EPA in order to



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determine the acceptability of the use of the Draft Method 4020 for verification of cleanup at other PCB contaminated areas to be addressed by the PCB PAM. Prior to EPA agreement regarding the evaluation of the two methods, if either the Method 8080 or the Draft Method 4020 results are greater than 25 ppm, additional soil must be removed until no verification samples exceed 25 ppm.

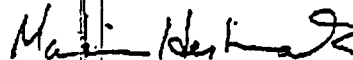
In addition, with respect to the cleanup of the transformer pads, it is inappropriate to utilize wipe samples for characterization of concrete. EPA requires that concrete samples be destructively assayed in order to determine whether or not they are contaminated. We are available to discuss this further if you require clarification.

The revision of the draft final PCB PAM adequately addresses public and CDPHE comments and is approved. However, in the second section of the PAM, the schedule is still referred to as draft. This is a final PAM and therefore the schedule should be final.

We believe it is also important to remind you that the 25 ppm cleanup level is only appropriate for restricted access areas and only if the limits of the spill have been determined to assure that there has been no substantial spread of the contamination. Thus, in order for the 25 ppm cleanup level to be considered protective, the PCB contamination extent must be adequately characterized and cannot have spread substantially and, access limitations will ultimately have to be a part of the final cleanup decisions for the areas addressed by the PCB PAM. If these conditions are not satisfied further cleanup may have to be performed.

If you have any questions regarding this letter, please contact me at (303) 294-1134.

Sincerely,



Martin Hestmark, Manager
Rocky Flats Project

cc: Joe Schieffelin, CDPHE
John Rampe, DOE